

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

PRO SLAB, INC. and BREMER CONSTRUCTION)	
MANAGEMENT, INC., on behalf of themselves and all)	
other similarly situated,)	
)	
Plaintiffs,)	Case No. 2:17-cv-03185-DCN
)	
v.)	
)	
ARGOS USA CORP.,)	
ARGOS NORTH AMERICA CORP.,)	
ARGOS USA LLC,)	
ARGOS READY MIX LLC,)	
ARGOS READY MIX (CLINAS) CORP.,)	
LAFARGE NORTH AMERICA INC.,)	
LAFARGE BUILDING MATERIALS INC.,)	
COASTAL CONCRETE COMPANY, INC.,)	
COASTAL CONCRETE SOUTHEAST II, LLC,)	
THOMAS CONCRETE, INC.,)	
THOMAS CONCRETE OF SOUTH CAROLINA, INC.,)	
EVANS CONCRETE HOLDINGS, INC.,)	
EVANS CONCRETE, LLC,)	
ELITE CONCRETE HOLDINGS, INC.,)	
ELITE CONCRETE, LLC,)	
ELITE CONCRETE OF RICHMOND HILL, LLC, and)	
ELITE CONCRETE OF SC, LLC,)	
)	
Defendants.)	
)	

ARGOS’ ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES

The following answers to the interrogatories set forth in Local Civil Rule 26.01 are provided by Defendants Argos USA Corp., Argos North America Corp., Argos USA LLC, Argos Ready Mix LLC, and Argos Ready Mix (Carolinas) Corp. (collectively, “Argos”).

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

Argos is unaware of any person or legal entity with a subrogation interest in any claims in this action.

B. As to each claim, state whether it should be tried jury or nonjury and why.

The plaintiffs in this action have requested a jury trial.

C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

Argos North America Corp. and Argos USA LLC are the only named Argos entities which are presently in existence. Argos USA LLC is a wholly owned subsidiary of Argos North America Corp. The parent company of Argos North America Corp. is Cementos Argos S.A., which is a subsidiary of Grupo Argos S.A. The stock of Grupo Argos S.A. and of Cementos Argos S.A. is publicly traded in the Republic of Colombia. No other publicly held corporation owns 10% or more of the stock of Argos North America Corp. Neither Argos USA LLC nor Argos North America Corp. owns 10% or more of the outstanding shares of any other publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

As Argos has not asserted any claims in this action, Interrogatory D is inapplicable.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

Argos is not aware of any related civil or criminal matter in this District.

F. If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Argos USA Corp., Argos Ready Mix LLC, and Argos Ready Mix (Carolinas) Corp. are named as defendants but, due to various corporate reorganizations, no longer exist. Counsel for Argos has already agreed to accept service on behalf of the named Argos entities which currently exist.

G. If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

Argos does not contend that any other person or legal entity is liable for the claims asserted against Argos in this suit.

February 15, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2018, the foregoing **ARGOS' ANSWERS TO LOCAL RULE 26.01 INTERROGATORIES** was filed electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all counsel of record in this matter.

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